

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**DEBRA JANSEN,** §  
§  
**Plaintiff,** §  
§  
v. § **Case No. 3:23-cv-693-B-BN**  
§  
**DOGGIE DELIGHT, INC. AND** §  
**STEVEN WARD, INDIVIDUALLY,** §  
§  
**Defendants.** §

**UNOPPOSED MOTION TO WITHDRAW**

**TO THE HONORABLE UNITED STATES DISTRICT COURT:**

Now Comes Douglas B. Welmaker, Movant and attorney of record for Plaintiff Debra Jansen, and files this Motion to Withdraw and in support thereof would show the following:

1. Douglas B. Welmaker, attorney of record for Debra Jansen hereby respectfully requests that this Honorable Court allow his withdrawal from the representation of Ms. Jansen.
2. The undersigned has repeatedly tried to communicate with Ms. Jansen, via phone calls, emails, text messages, regular mail and priority mail, but Ms. Jansen will not respond to the undersigned. Because it has become impossible to communicate with Ms. Jansen, it has become necessary to withdraw from representation of Ms. Jansen.
3. This Motion to Withdraw is not sought for the purposes of delay, but so that justice may be done.
4. Prior to the filing of this motion, the undersigned attempted to discuss the filing of

this Motion with Plaintiff, but Plaintiff has not responded. Plaintiff will be emailed a file-stamped copy of this Motion via email.

5. There is a status conference scheduled for this Friday, January 26 at 9:00 a.m. At this conference, the Court has stated that counsel SHALL confer and be prepared to propose three dates for the settlement conference to take place on or before February 29, 2024, during the weeks of February 12 through 16, and 26 through 29.
6. There are no other deadlines in this matter.
7. Ms. Jansen's email is [debleah@me.com](mailto:debleah@me.com), and her last known address was 5846 Marina Dr., Garland, TX 75043.

8. Movant has communicated this request to Daniel Moskowitz, counsel of record for Defendant Doggie Delight, Inc., who has indicated he is not opposed to this Motion.

Wherefore, premises considered, Movant Douglas B. Welmaker respectfully requests that this Court grant this Motion to Withdraw and such other and further relief that Movant may show himself justly entitled.

Respectfully submitted,

WELMAKER LAW, PLLC

/s/ Douglas B. Welmaker  
Douglas B. Welmaker  
Attorney-in-Charge  
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**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

I certify that I attempted in good faith to confer with counsel for Defendant and with Plaintiff in an effort to resolve this dispute without court action. Despite this fact, Plaintiff refused to communicate with me. Counsel for Defendant indicated he is not opposed to the relief sought herein.

/s/ Douglas B. Welmaker  
Douglas B. Welmaker

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion to Withdraw has been electronically served on all counsel of record via Notice of Electronic Filing on a known Filing User through the CM/ECF system on January 24, 2024. This motion has also been served on Plaintiff at [debleah@me.com](mailto:debleah@me.com), and at her last known address, at 5846 Marina Dr., Garland, TX 75043.

/s/ Douglas B. Welmaker  
Douglas B. Welmaker